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GREATER PHILADELPHIA SEARCH AND RESCUE
704 PRESTON ROAD, ERDENHEIM, PA 19118-1327
BUSINESS TELEPHONE: (215) 233-3360
EMERGENCIES ONLY: (215) 630-6744

April 5, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission

FCC/MA

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FBI

GPSR
Docket 92-235
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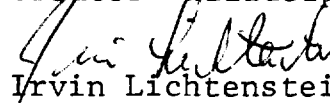
of Engineers in Berkes County, Pennsylvania and to the western edge of Chester County, Pennsylvania. Our primary response area encompasses the southeast quarter of Pennsylvania, the southern half of New Jersey, parts of Delaware, and Maryland. No municipality would accept responsibility for the operations of a volunteer group covering such a wide area.

GPSR provides immediate aid to those we find as a result of search operations but we do not transport the patient over the road and therefore GPSR is not an EMS provider as defined by state law or our regional EMS Council. We do train with local providers and at regional schools, and must coordinate our responses with local providers to assure continuity of care once the lost person(s) are located.

The other major user of SERS not accommodated by other emergency services requiring municipal status are disaster relief organizations such as the American Red Cross, Salvation Army, Mennonite Relief, or similar services that operate across state boundaries. These non-governmental agencies provide needed emergency services but would not be considered public safety agencies under current definitions.

We urge the Commission to provide for these non-governmental emergency service providers by allowing non-profit voluntary associations that are bonafide providers of life-safety services to continue to operate on their current allocations and to be accorded public safety service status under the proposed Part 88. The need to operate over large areas, to operate intensely with low power for several days or weeks in one part of a wide service area and then return to little or no operation until the next call may require an approach similar to that used for the Red Cross, a group of channels with priority of assignment to wide area service providers. It will also require an engineering approach to the design of tactical systems for search and rescue providers, rather than a coordinator who does not understand this requirement.

Sincerely,
Greater Philadelphia Search and Rescue


Irvin Lichtenstein, Chief